

REGION 6 1445 ROSS AVENUE, SUITE 1200 DALLAS, TEXAS 75202 – 2733

June 9, 2014

Mr. Erwin Pino Chaparral Energy, LLC 701 Cedar Lake Boulevard Oklahoma City, OK 73114

Re: Mechanical Integrity Test Failure

Inventory No.Well No.Location-Osage County, OklahomaOS01223-W5SE/4, Sec. 3, T 27N, R 5EOS3858105-D18SE/4, Sec. 5, T 26N, R 6E

Dear Mr. Pino:

On May 16, 2014, the referenced injection wells failed mechanical integrity tests. They are, therefore, noncompliant with Osage Underground Injection Control program regulations which require injection wells authorized by rule to have mechanical integrity.

Within 15 days of the date of this letter, you must complete one of the following:

- 1. Demonstrate mechanical integrity of the wells. Notify the Osage Nation Environmental and Natural Resources Department at 918-287-5333 at least five days before testing the wells so they can witness the tests.
- 2. Cease use of the wells for fluid injection. You could resume use of the wells for fluid injection after demonstrating that they have mechanical integrity.

The Safe Drinking Water Act authorizes the Environmental Protection Agency to require injection wells to have mechanical integrity. To avoid additional enforcement, please demonstrate mechanical integrity of the wells or cease using it for fluid injection, within 15 days, as requested.

Please contact Mr. David Aguinaga at 214-665-6439 if you have any questions.

Sincerely yours,

Jerry Saunders Associate Director Water Enforcement Branch

November 24, 2014

REPLY TO: 6EN-WR

Certified Mail # 7007 1490 0002 3413 8478 - Return Receipt Requested

Ms. Nancy Hunziker EOR-Regulatory Chaparral Energy, LLC 701 Cedar Lake Boulevard Oklahoma City, OK 73114

Re: Mechanical Integrity Deficiency

<u>Inventory No.</u> <u>Well No.</u> <u>Location-Osage County, Oklahoma</u> OS0623 111-W3 <u>NW/4, Sec. 08, T 26N, R 06E</u>

Dear Ms. Hunziker:

On November 18, 2014, a field inspector determined through routine inspection that the referenced well no longer maintains mechanical integrity. It is, therefore, noncompliant with Osage Underground Injection Control program regulations which require injection wells authorized by rule to have mechanical integrity.

Within 15 days of the date of this letter, you must complete one of the following:

- 1. Demonstrate mechanical integrity of the well. Notify the Osage Nation Environmental and Natural Resources Department at 918-287-5333 at least five days before testing the well so they can witness the test.
- 2. Cease use of the well for fluid injection. You could resume use of the well for fluid injection after demonstrating that it has mechanical integrity.

The Safe Drinking Water Act authorizes the Environmental Protection Agency to require injection wells to have mechanical integrity. To avoid additional enforcement, please demonstrate mechanical integrity of the well or cease using it for fluid injection, within 15 days, as requested.

Please contact Mr. David Aguinaga at 214-665-6439 if you have any questions.

Sincerely yours,

Jerry Saunders Associate Director Water Enforcement Branch

cc: BIA, Minerals Branch

April 18, 2014

REPLY TO: 6EN-WR

Mr. Erwin Pinot Chaparral Energy, LLC 701 Cedar Lake Boulevard Oklahoma City, OK 73114

Re: Plugging Requirement

Inventory No.: OS0718 Well No.: F-W2

Location: NW/4, Sec. 2, T 25N, R 6E

Osage County, Oklahoma

# Dear Pinot:

A March 18, 2014, inspection report indicates that the referenced injection well is inactive. Osage Underground Injection Control regulations require inactive wells to be plugged within one year after injection ceases. We may extend the plugging deadline if you have an acceptable plan for future use of the well. Send us your plan for future use within 30 days from the date of this letter if you want an extended plugging deadline.

Please contact me at 214-665-6439 if you have any questions.

Sincerely yours,

David Aguinaga Environmental Scientist Water Resources Section

August 20, 2014

REPLY TO: 6EN-WR

Mr. Blaine Haag Legacy Petroleum, LLC 3115 Kingston Dr. Bartlesville, OK 74006

Re: Mechanical Integrity Test Requirement

<u>Inventory No.</u> <u>Well No.</u> <u>Location-Osage County, Oklahoma</u> OS0815 Blackbun 1SWD <u>Location-Osage County, Oklahoma</u> NW]/4, Sec. 05, T 22N, R 07]E

Dear Mr. Haag:

A file review indicates that the referenced injection well does not have mechanical integrity. It is, therefore, noncompliant with Osage Underground Injection Control program regulations which require injection wells authorized by rule to have mechanical integrity.

Within 15 days of the date of this letter, you must complete one of the following:

- 1. Demonstrate mechanical integrity of the well. Notify the Osage Nation Environmental and Natural Resources Department at 918-287-5333 at least five days before testing the well so they can witness the test.
- 2. Cease use of the well for fluid injection. You could resume use of the well for fluid injection after demonstrating that it has mechanical integrity.

The Safe Drinking Water Act authorizes the Environmental Protection Agency to require injection wells to have mechanical integrity. To avoid additional enforcement, please demonstrate mechanical integrity of the well or cease using it for fluid injection, within 15 days, as requested.

Please contact Mr. David Aguinaga at 214-665-6439 if you have any questions.

Sincerely yours,

Jerry Saunders Associate Director Water Enforcement Branch

May 19, 2014

REPLY TO: 6EN-WR

Mr. Ken Hawk Oliphant Operating Co., Ltd. P.O. Box 4529 Tulsa, OK 74159

Re: Mechanical Integrity Test Failure

> Inventory No. Well No. Location-Osage County, Oklahoma OS0889 5WI SE/4, Sec. 27, T 24N, R 7E

Dear Mr. Hawk:

On February 27 2014, the referenced injection well failed a mechanical integrity test. It is, therefore, noncompliant with Osage Underground Injection Control program regulations which require injection wells authorized by rule to have mechanical integrity.

Within 15 days of the date of this letter, you must complete one of the following:

- 1. Demonstrate mechanical integrity of the well. Notify the Osage Nation Environmental and Natural Resources Department at 918-287-5333 at least five days before testing the well so they can witness the test.
- 2. Cease use of the well for fluid injection. You could resume use of the well for fluid injection after demonstrating that it has mechanical integrity.

The Safe Drinking Water Act authorizes the Environmental Protection Agency to require injection wells to have mechanical integrity. To avoid additional enforcement, please demonstrate mechanical integrity of the well or cease using it for fluid injection, within 15 days, as requested.

Please contact Mr. David Aguinaga at 214-665-6439 if you have any questions.

Sincerely yours,

Jerry Saunders **Associate Director** Water Enforcement Branch

BIA, Minerals Branch cc:



REGION 6 1445 ROSS AVENUE, SUITE 1200 DALLAS, TEXAS 75202 – 2733

June 9, 2014

REPLY TO: 6EN-WR

Mr. Erwin Pinot Chaparral Energy, LLC 701 Cedar Lake Boulevard Oklahoma City, OK 73114

Re: Plugging Requirement

Inventory No.: OS1169 Well No.: BE-11-2

Location: NE/4, Sec. 28, T 25N, R 8E

Osage County, Oklahoma

# Dear Pinot:

A April 4, 2014, inspection report indicates that the referenced injection well is inactive. Osage Underground Injection Control regulations require inactive wells to be plugged within one year after injection ceases. We may extend the plugging deadline if you have an acceptable plan for future use of the well. Send us your plan for future use within 30 days from the date of this letter if you want an extended plugging deadline.

Please contact me at 214-665-6439 if you have any questions.

Sincerely yours,

David Aguinaga Environmental Scientist Water Resources Section

May 22, 2014

REPLY TO: 6EN-WR

CEP Mid-Continent, LLC Mr. Larry Casey 15 West 6<sup>th</sup> St., Suite 1100 Tulsa, OK 74119-5415

Re: Failure to Complete Corrective Action

Inventory No.: OS1338

Well No.: 2A

Location: SW/4, Sec. 06, T22N, R10E

Osage County, Oklahoma

Dear Mr. Casey:

On June 24, 2013, we approved a corrective action plan to prevent fluids from moving through the referenced well bore into underground sources of drinking water (USDWs) during its temporary abandonment period. That approval required you to plug the referenced well. A February 27, 2014, inspection indicates that you have not completed required corrective actions.

The Safe Drinking Water Act authorizes the Environmental Protection Agency to protect USDWs from contamination from underground injection wells. To avoid additional enforcement according to that law, please plug the well within 30 days from the date of this letter.

Please contact Mr. David Aguinaga at 214-665-6439 if you have any questions.

Sincerely yours

Willie Lane, Jr. Chief Water Resources Section

cc: BIA, Minerals Branch



REGION 6 1445 ROSS AVENUE, SUITE 1200 DALLAS, TEXAS 75202 – 2733

September 16, 2014

REPLY TO: 6EN-WR

McCann Resources, Inc. Mr. Mark McCann 1613 W. 6<sup>th</sup> St. Bartlesville, OK 74003

Re: Plugging/Corrective Requirement

Inventory No: OS1845

Well No.: 2

Location: NE/4, Sec. 09, T26N, R10E

Osage County, Oklahoma

Dear Mr. McCann:

A July 14, 2014, inspection report indicates that the referenced injection well is inactive. Osage Underground Injection Control regulations require inactive wells to be plugged within one year after injection ceases. We may extend the plugging deadline if you have an acceptable plan for future use of the well. Send us your plan for future use within 30 days from the date of this letter if you want an extended plugging deadline.

The same inspection report shows the static fluid level in the well to be 260 feet below ground level. This is less than 50 feet below the base of underground sources of drinking water in the vicinity of the well. This condition represents an unacceptable threat that fluids could move through the well bore into USDWs. Therefore, any plan for future use must include corrective actions you would implement to prevent USDW contamination during the temporary abandonment period. That plan may include: repairing the well so it has mechanical integrity, lowering the static fluid level to at least 285 feet subsurface, or any other action which would adequately protect underground sources of drinking water from contamination.

Please contact Mr. David Aguinaga at 214-665-6439 if you have any questions.

Sincerely yours,

Paulette Johnsey Chief Water Resources Section

August 20, 2014

REPLY TO: 6EN-WR

Mr. James Miller Eagle One Oil P.O. Box 67 Shidler, OK 74652

Re: Failure to Complete Corrective Action

Inventory No.: OS2356 Well No.: 2M

Location: SW/4, Sec. 03, T26N, R06E

Osage County, Oklahoma

Dear Mr. Miller:

On August 15, 2013, we approved a corrective action plan to prevent fluids from moving through the referenced well bore into underground sources of drinking water (USDWs) during its temporary abandonment period. That approval required you to install a fluid level monitor, 385 feet of stainless steel tubing in the annulus, conduct an 'Ada' pressure test and measure the fluid level annually. A May 21, 2014, inspection report indicates you have not completed required corrective actions.

The Safe Drinking Water Act authorizes the Environmental Protection Agency to protect USDWs from contamination caused by underground injection wells. To avoid additional enforcement, please complete the required corrective actions within 30 days from the date of this letter.

Please contact Mr. David Aguinaga at 214-665-6439 if you have any questions.

Sincerely yours

Paulette Johnsey Chief Water Resources Section

cc: BIA, Minerals Branch

August 27, 2014

REPLY TO: 6EN-WR

Ms. Melanie Crawford Linn Operating, Inc. 14000 Quail Springs Pkwy, Ste 5000 Oklahoma City, OK 73134

Re: Corrective Action / Plug and Abandonment Plan Approval

Inventory Nos. Well Nos. Locations: Osage County, Oklahoma

OS3046 WILFR14 SW/4 Sec. 3, T 26N, R 06E OS4175 NRU 26-15 SE/4 Sec. 28, T 24N, R 07E

Dear Ms. Crawford:

Thank you for your July 15, 2014, corrective action plan for OS4175 and your July 14, 2014, plugging plan for OS3046. Your plans should adequately protect underground sources of drinking water (USDWs) in the vicinity of the wells, when completed. You must complete the proposed work with 30 days of receiving this letter.

Before beginning the work, obtain the necessary permits from the Bureau of Indian Affairs (BIA) Osage Agency. Contact the Osage UIC Office to schedule an MIT after completing the work and submit an Osage Form No. 139 which shows completed work to the BIA and to this office.

Please contact Mr. David Aguinaga at 214-665-6439 if you have any questions.

Sincerely yours,

Paulette Johnsey Chief Water Resources Section



REGION 6 1445 ROSS AVENUE, SUITE 1200 DALLAS, TEXAS 75202 – 2733

September 16, 2014

REPLY TO: 6EN-WR

Mr. Bob Reichardt Linn Operating, Inc. 14000 quail Springs Parkway, Suite 5000 Oklahoma City, OK 73134

Re: Mechanical Integrity Test Failure

Inventory No. Well No. Location-Osage County, Oklahoma
OS3051 ANNE 11 SE/4, Sec. 3, T 26N, R 06E

Dear Mr. Reichardt:

On August 13, 2014, the referenced injection well failed a mechanical integrity test. It is, therefore, noncompliant with Osage Underground Injection Control program regulations which require injection wells authorized by rule to have mechanical integrity. Within 15 days of the date of this letter, you must complete one of the following:

- 1. Demonstrate mechanical integrity of the well. Notify the Osage Nation Environmental and Natural Resources Department at 918-287-5333 at least five days before testing the well so they can witness the test.
- 2. Cease use of the well for fluid injection. You could resume use of the well for fluid injection after demonstrating that it has mechanical integrity.

The Safe Drinking Water Act authorizes the Environmental Protection Agency to require injection wells to have mechanical integrity. To avoid additional enforcement, please demonstrate mechanical integrity of the well or cease using it for fluid injection, within 15 days, as requested.

Please contact Mr. David Aguinaga at 214-665-6439 if you have any questions.

Sincerely yours,

Jerry Saunders Associate Director Water Enforcement Branch

cc: BIA, Minerals Branch



REGION 6 1445 ROSS AVENUE, SUITE 1200 DALLAS, TEXAS 75202 – 2733

July 2, 2014

REPLY TO: 6EN-WR

Linn Operating, Inc. Ms. Melanie Crawford 14000 Quail Springs Pkwy, Ste 5000 Oklahoma City, OK 73134

Re: Mechanical Integrity Test Failure

<u>Inventory No.</u> <u>Well No.</u> <u>Location-Osage County, Oklahoma</u> OS4175 26-15 SE/4, Sec. 28, T 24N, R 7E

Dear Ms. Crawford:

On January 16, 2014, the referenced injection well failed a mechanical integrity test. It is, therefore, noncompliant with Osage Underground Injection Control program regulations which require injection wells authorized by rule to have mechanical integrity.

Within 15 days of the date of this letter, you must complete one of the following:

- 1. Demonstrate mechanical integrity of the well. Notify the Osage Nation Environmental and Natural Resources Department at 918-287-5333 at least five days before testing the well so they can witness the test.
- 2. Cease use of the well for fluid injection. You could resume use of the well for fluid injection after demonstrating that it has mechanical integrity.

The Safe Drinking Water Act authorizes the Environmental Protection Agency to require injection wells to have mechanical integrity. To avoid additional enforcement, please demonstrate mechanical integrity of the well or cease using it for fluid injection, within 15 days, as requested.

Please contact Mr. David Aguinaga at 214-665-6439 if you have any questions.

Sincerely yours,
Jerry Saunders
Associate Director
Water Enforcement Branch

January 22, 2014

REPLY TO: 6EN-WR

Mr. Jimmy Witcraft Rainbow Oil and Gas, LLC P. O. Box 56 Pawhuska, OK 74056

Re: Mechanical Integrity Test Failure

Inventory No. Well No. Location-Osage County, Oklahoma
OS4221 Boots 82-1 NE/4, Sec. 23, T 26N, R 9E

Dear Mr. Witcraft:

On November 26, 2013, the referenced injection well failed a mechanical integrity test. It is, therefore, noncompliant with Osage Underground Injection Control program regulations which require injection wells authorized by rule to have mechanical integrity.

Within 15 days of the date of this letter, you must complete one of the following:

- 1. Demonstrate mechanical integrity of the well. Notify the Osage Nation Environmental and Natural Resources Department at 918-287-5333 at least five days before testing the well so they can witness the test.
- 2. Cease use of the well for fluid injection. You could resume use of the well for fluid injection after demonstrating that it has mechanical integrity.

The Safe Drinking Water Act authorizes the Environmental Protection Agency to require injection wells to have mechanical integrity. To avoid additional enforcement, please demonstrate mechanical integrity of the well or cease using it for fluid injection, within 15 days, as requested.

Please contact Mr. David Aguinaga at 214-665-6439 if you have any questions.

Sincerely yours,

Jerry Saunders Associate Director Water Enforcement Branch

November 24, 2014

REPLY TO: 6EN-WR

Mr. Mike Brown GBC Petroleum P.O. Box 82 Hominy, OK 74035

Re: Overdue Mechanical Integrity Test

Inventory No. Well No. Location-Osage County, Oklahoma SW/4, Sec. 33, T 24N, R 08E

Dear Mr. Brown:

A file review indicates the referenced injection well is overdue for a mechanical integrity test. It is, therefore, noncompliant with Osage Underground Injection Control program regulations which require injection wells authorized by rule to have mechanical integrity.

Within 15 days of the date of this letter, you must complete one of the following:

- 1. Demonstrate mechanical integrity of the well. Notify the Osage Nation Environmental and Natural Resources Department at 918-287-5333 at least five days before testing the well so they can witness the test.
- 2. Cease use of the well for fluid injection. You could resume use of the well for fluid injection after demonstrating that it has mechanical integrity.

The Safe Drinking Water Act authorizes the Environmental Protection Agency to require injection wells to have mechanical integrity. To avoid additional enforcement, please demonstrate mechanical integrity of the well or cease using it for fluid injection, within 15 days, as requested.

Please contact Mr. David Aguinaga at 214-665-6439 if you have any questions.

Sincerely yours,

Jerry Saunders
Associate Director
Water Enforcement Branch

**REGION 6** 1445 ROSS AVENUE, SUITE 1200 DALLAS, TX 75202-2733

MOV 2 5 2014

REPLY TO: 6EN-WR

Mr. Mark Helmer Helmer Oil P.O. Box 1325 Pawhuska, OK 74056

Re:

Overdue Mechanical Integrity

Inventory No. Well No.

Location-Osage County, Oklahoma

OS4619

NE/4, Sec. 4, T 23N, R 08E

Dear Mr. Helmer:

A file review indicates the referenced injection well is overdue for a mechanical integrity test. It is, therefore, noncompliant with Osage Underground Injection Control program regulations which require injection wells authorized by rule to have mechanical integrity.

Within 15 days of the date of this letter, you must complete one of the following:

- 1. Demonstrate mechanical integrity of the well. Notify the Osage Nation Environmental and Natural Resources Department at 918-287-5333 at least five days before testing the well so they can witness the test.
- 2. Cease use of the well for fluid injection. You could resume use of the well for fluid injection after demonstrating that it has mechanical integrity.

The Safe Drinking Water Act authorizes the Environmental Protection Agency to require injection wells to have mechanical integrity. To avoid additional enforcement, please demonstrate mechanical integrity of the well or cease using it for fluid injection, within 15 days, as requested.

Please contact Mr. David Aguinaga at 214-665-6439 if you have any questions.

Sincerely yours,

Jerry Saunders Associate Director Water Enforcement Branch

cc:

March 11, 2014

Mr. David Wikel 15521 State Highway 20 Skiatook, OK 74070

Re: Mechanical Integrity Test Failure

<u>Inventory No.</u> Well No. <u>Location-Osage County, Oklahoma</u> OS4763 1SWD <u>Location-Osage County, Oklahoma</u> NW/4, Sec. 33, T 24N, R 12E

Dear Mr. Wikel:

On December 19, 2013, the referenced injection well failed a mechanical integrity test. It is, therefore, noncompliant with Osage Underground Injection Control program regulations which require injection wells authorized by rule to have mechanical integrity.

Within 15 days of the date of this letter, you must complete one of the following:

- 1. Demonstrate mechanical integrity of the well. Notify the Osage Nation Environmental and Natural Resources Department at 918-287-5333 at least five days before testing the well so they can witness the test.
- 2. Cease use of the well for fluid injection. You could resume use of the well for fluid injection after demonstrating that it has mechanical integrity.

The Safe Drinking Water Act authorizes the Environmental Protection Agency to require injection wells to have mechanical integrity. To avoid additional enforcement, please demonstrate mechanical integrity of the well or cease using it for fluid injection, within 15 days, as requested.

Please contact Mr. David Aguinaga at 214-665-6439 if you have any questions.

Sincerely yours,

Jerry Saunders Associate Director Water Enforcement Branch

REPLY TO: 6EN-WR

Certified Mail # 7007 1490 0002 3413 8249 - Return Receipt Requested

Mr. J. Scott Ducharme Performance Energy Resources, LLC P.O. Box 628 Barnsdall, OK 74002

Re: Termination of Authorization to Inject

Permit No.: 0651261P5079

Well No.: 17

Location: NW/4, Sec. 36, T 25N, R 11E

Osage County, Oklahoma

Dear Mr. Ducharme:

A February 24, 2014, inspection report indicates the referenced injection well failed a mechanical integrity test. Therefore, authorization to inject for this well is terminated. You must cease use of the well for underground injection of fluids and disconnect injection pipelines from the wellhead within five days from the date of this letter. You may resume use of the well for fluid injection after you demonstrate mechanical integrity and receive authorization to inject from this office.

Continued use of the well for fluid injection would violate the Safe Drinking Water Act and could result in further enforcement action. This enforcement may include administrative penalties.

Please contact Mr. David Aguinaga at 214-665-6439 if you have any questions.

Sincerely yours,

Jerry Saunders Associate Director Water Enforcement Branch

cc: BIA, Minerals Branch

September 16, 2014

REPLY TO: 6EN-WR

Mr. Jim Sommers Leg Up Operating Company, LLC 9226 South Elwood Avenue, Ste C Tulsa, OK 74170-0156

Re: Requirement to Conduct Mechanical Integrity Test

Permit No.: 06S1261P5119

Well No.: T-3

Location: SE/4, Sec. 13, T 22N, R 8E Osage County, Oklahoma

Dear Mr. Sommers:

A file review indicates that the referenced well is overdue for a mechanical integrity test as required by Osage Underground Injection Control (UIC) regulations and the referenced permit. Therefore, you must either test mechanical integrity of the well or cease its use for fluid injection within 15 days from the date of this letter. Contact the Osage Nation Department of Environmental and Natural Resources (918-287-5333) at least five days before you test the well so they can witness the test.

The Safe Drinking Water Act authorizes the Environmental Protection Agency (EPA) to require injection wells to have mechanical integrity. To avoid additional enforcement, including termination of authorization to inject for the well, please demonstrate its mechanical integrity, within 15 days, as requested.

Please contact Mr. David Aguinaga at 214-665-6439 if you have any questions.

Sincerely yours,

Jerry Saunders Associate Director Water Enforcement Branch

cc: BIA, Minerals Branch

Certified Mail #7007 1490 0002 3413 8379 - Return Receipt Requested

August 18, 2014

REPLY TO: 6EN-WR

Mr. Chad Sellers P.O. Box 877 Sand Springs, OK 74063

Re: Termination of Authorization to Inject

Permit No.: 06S1261P5222

Well No.: 04

Location: NW/4, Sec. 32, T22N, R11E

Osage County, Oklahoma

Dear Mr. Sellers:

Federal Underground Injection Control (UIC) Regulations require you to periodically demonstrate mechanical integrity of your injection wells. A file review indicates the referenced injection well was due for a five-year mechanical integrity test on December 10, 2013. To date, you have not conducted that test.

Therefore, authorization to inject for this well is terminated. You must cease use of the well for underground injection of fluids and disconnect injection pipelines from the wellhead within five days from the date of this letter. You may resume use of the well for fluid injection after successfully completing a mechanical integrity test and receiving written authorization to inject.

Continued use of the well for fluid injection would violate the Safe Drinking Water Act and could result in further enforcement action. This enforcement may include administrative penalties.

Please contact Mr. David Aguinaga at 214-665-6439 if you have any questions.

Sincerely yours,

Jerry Saunders Associate Director Water Enforcement Branch

August 15, 2014

REPLY TO: 6EN-WR

Beckham And Butler 1124 South Price Hominy, OK 74035

Re: Mechanical Integrity Test Failure / Request Osage Form 139

<u>Inventory No.</u> <u>Well No.</u> <u>Location-Osage County, Oklahoma</u> OS5239 2BI NW/4, Sec. 6, T 24N, R 10E

Dear Beckham and Butler:

A June 30, 2014, inspection report indicates that the referenced injection well failed a mechanical integrity test. It is, therefore, noncompliant with Osage Underground Injection Control program regulations which require injection wells authorized by rule to have mechanical integrity.

Within 15 days of the date of this letter, you must complete one of the following:

- 1. Demonstrate mechanical integrity of the well. Notify the Osage Nation Environmental and Natural Resources Department at 918-287-5333 at least five days before testing the well so they can witness the test.
- 2. Cease use of the well for fluid injection. You could resume use of the well for fluid injection after demonstrating that it has mechanical integrity.

The Safe Drinking Water Act authorizes the Environmental Protection Agency to require injection wells to have mechanical integrity. To avoid additional enforcement, please demonstrate mechanical integrity of the well or cease using it for fluid injection, within 15 days, as requested.

Please contact Mr. David Aguinaga at 214-665-6439 if you have any questions.

Sincerely yours,

Jerry Saunders Associate Director Water Enforcement Branch

February 18, 2014

REPLY TO: 6EN-WR

Mr. Mark Sousa Operations Dewey Performance Partners P.O. Box 2306 Bartlesville, OK 74005

Re: Plugging Requirement

Inventory No.: OS5253 Well No.: S-2

Location: NW/4, Sec. 24, T 25N, R 11E

Osage County, Oklahoma

Dear Mr. Sousa:

According to our February 18, 2014, conversation you plan to plug the referenced injection well. The Osage Underground Injection Control (UIC) program requires that injection wells be plugged within one year after injection ceases. Therefore, you must plug the referenced well by October 10, 2014.

Osage UIC program plugging requirements are enclosed for your information. Note that you must submit a plugging plan, by certified mail, to the Osage UIC Office in Pawhuska at least five days before plugging operations begin. We can waive this notification requirement if a qualified Environmental Protection Agency representative is available to witness plugging.

Please contact me at 214-665-6439 if you have any questions.

Sincerely yours,

David Aguinaga Environmental Scientist Water Resources Section

November 24, 2014

REPLY TO: 6EN-WR

Certified Mail # 7007 1490 0002 3143 8454 - Return Receipt Requested

Mr. Kenneth Y Park, Jr. KY Park Oil Company, LLC 9150 West Highway 20 Skiatook, OK 74070

Re: Termination of Authorization to Inject

Permit No.: 06S1261P5256

Well No.: 2A

Location: NW/4, Sec. 23, T 23N, R 11E

Osage County, Oklahoma

Dear Mr. Park:

A file review indicates the referenced injection well is overdue for a mechanical integrity test (MIT). Therefore, authorization to inject for this well is terminated. You must cease use of the well for underground injection of fluids and disconnect injection pipelines from the wellhead within five days from the date of this letter. You may resume use of the well for fluid injection after you successfully complete an MIT and receive authorization to inject.

Continued use of the well for fluid injection would violate the Safe Drinking Water Act and could result in further enforcement action. This enforcement may include administrative penalties.

Please contact Mr. David Aguinaga at 214-665-6439 if you have any questions.

Sincerely yours,

Jerry Saunders Associate Director Water Enforcement Branch

cc: BIA, Minerals Branch



REGION 6 1445 ROSS AVENUE, SUITE 1200 DALLAS, TEXAS 75202 – 2733

July 21, 2014

REPLY TO: 6EN-WR

Certified Mail # - 7007 1490 0002 3413 8355 Return Receipt Requested

Mr. J. Scott DuCharme Performance Energy Resources, LLC PO Box 628 Barnsdall, OK 74002

Re: Termination of Authorization to Inject

Permit No.:	Well No.:	Location: Osage County, Oklahoma
06S1262P5364	3	SW/4, Sec. 14, T 27N, R11E
06S1265P5421	201	SW/4, Sec. 30, T 25N, R11E
06S1261P5738	1	NW/4, Sec. 27, T 27N, R11E
06S1261P5991	417	SW/4, Sec. 33, T 26N, R12E
06S1261P6261	1B	NW/4, Sec. 23, T25N, R06E
06S1261P6154	7-11W	NE/4, Sec. 25, T25N, R09E
06S1261P6127	5-5	SW/4, Sec. 35, T26N, R11E

Dear Mr. DuCharme:

A May 15, 2014, inspection report indicates the static fluid level in the well annuals of well number 3 is above the zone of Underground Sources of Drinking Water (USDWs) and the well has not been plugged according to your June 16, 2010, plugging plan. Inspection reports for the remaining wells indicate that they have lost mechanical integrity or failed mechanical integrity tests (MIT).

Therefore, authorization to inject for the referenced wells is terminated. You must cease use of the wells for underground injection of fluids and disconnect injection pipelines from the wellhead within five days from the date of this letter. You may resume use of the wells for fluid injection after you complete corrective actions, successfully complete MIT's and receive authorization to inject from this office.

Continued use of these wells for fluid injection would violate the Safe Drinking Water Act and could result in further enforcement action. This enforcement may include administrative penalties.

Please contact Mr. David Aguinaga at 214-665-6439 if you have any questions.

Sincerely yours,

Jerry Saunders Associate Director Water Enforcement Branch

May 22, 2014

Mr. Donald C. Schroeder Watchman-Schroeder P.O. Box 1138 Pawhuska, OK 74056

Re: Mechanical Integrity Test Failure

Inventory No.Well No.Location-Osage County, OklahomaOS53912-ASE/4, Sec. 35, T 29N, R 10E

Dear Mr. Schroeder:

Federal Underground Injection Control (UIC) Regulations require you to periodically demonstrate mechanical integrity of your injection wells. On July 2, 2013, the Osage Nation Environmental and Natural Resources Department requested you to conduct a mechanical integrity test of the referenced injection well. To date, you have not conducted that test.

A March 11, 2014, inspection report indicates the well is inactive and the static fluid level in the well annulus is 175 feet below the ground surface. This condition represents an unacceptable threat that fluids could move through the well bore into USDWs. Therefore, within 15 days of the date of this letter, you must complete one of the following:

- 1. Demonstrate mechanical integrity of the well. Notify the Osage Nation Environmental and Natural Resources Department at 918-287-5333 at least five days before testing the well so they can witness the test.
- 2. Send us a corrective action plan to reduce the static fluid level in the well to at least 550 feet subsurface or any other action which would adequately protect drinking water sources from contamination.

Please contact Mr. David Aguinaga at 214-665-6439 if you have any questions.

Sincerely yours,

Jerry Saunders Associate Director Water Enforcement Branch

September 18, 2014

REPLY TO: 6EN-WR

Certified Mail # 7007 1490 0002 3413 8386 - Return Receipt Requested

Mr. Donald C. Schroeder Watchman-Schroeder P.O. Box 1138 Pawhuska, OK 74056

Re: Termination of Authorization to Inject

Permit No.: 06S1261P5391

Well No.: 2-A

Location: SE/4, Sec. 35, T 29N, R 10E

Osage County, Oklahoma

Dear Mr. Schroeder:

A file review indicates that the referenced injection well failed a mechanical integrity test. Therefore, authorization to inject for this well is terminated. You have ceased use of the well for underground injection of fluids and disconnected injection pipelines from the wellhead. Osage Underground Injection Control regulations require inactive wells to be plugged within one year after injection ceases. We may extend the plugging deadline if you have an acceptable plan for future use of the well. Send us your plan for future use within 30 days from the date of this letter if you want an extended plugging deadline.

Continued use of the well for fluid injection would violate the Safe Drinking Water Act and could result in further enforcement action. This enforcement may include administrative penalties.

Please contact Mr. David Aguinaga at 214-665-6439 if you have any questions.

Sincerely yours,

Jerry Saunders Associate Director Water Enforcement Branch

cc: BIA, Minerals Branch



REGION 6 1445 ROSS AVENUE, SUITE 1200 DALLAS, TEXAS 75202 – 2733

September 15, 2014

REPLY TO: 6EN-WR

Mr. Chris Clemishire B & G Oil Company P.O. Box 558 Hominy, OK 74035

Re: Plugging Requirement

Inventory No.: OS5459

Well No.: 2

Location: SE/4, Sec. 11, T 23N, R 07E

Osage County, Oklahoma

Dear Mr. Clemishire:

Your 2013 Annual Report indicates that the referenced injection well is inactive. Osage Underground Injection Control regulations require inactive wells to be plugged within one year after injection ceases. We may extend the plugging deadline if you have an acceptable plan for future use of the well. Send us your plan for future use within 30 days from the date of this letter if you want an extended plugging deadline.

Please contact me at 214-665-6439 if you have any questions.

Sincerely yours,

David Aguinaga Environmental Scientist Water Resources Section

Certified Mail # 7007 1490 0002 3413 8300 - Return Receipt Requested

REPLY TO: 6EN-WR

Petromerica Operating, LLC Mr. Denny Hurst P.O. Box 988 Skiatook, OK 74070

Re: Repair Plan

Inventory No.: OS5469 Well No.: Woolaroc 2-P

Location: SW/4, Sec. 14, T25N, R11E

Osage County, Oklahoma

Dear Mr. Hurst:

Thank you for your January 10, 2014, repair plan for the referenced injection well. The proposed plan to rework the well bore, reduce the static fluid level in the well to 525 feet below the ground surface or plug the well meets Environmental Protection Agency requirements. You must either demonstrate mechanical integrity of the well or complete plugging by August 1, 2014.

Contact the Osage Nation Environmental and Natural Resources Department at 918-287-5333 at least five days before you test the well so they can witness the test. The well must remain shut-in until you demonstrate its mechanical integrity. Continued use of the well for fluid injection would violate the Safe Drinking Water Act and could result in further enforcement action. This enforcement may include administrative penalties.

Before starting a well work over, obtain a permit from the Bureau of Indian Affairs, Osage Agency. If you have any questions, please contact Mr. David Aguinaga at 214-665-6439.

Sincerely yours,

Jerry Saunders
Associate Director
Water Enforcement Branch

cc: BIA Minerals Branch



REGION 6 1445 ROSS AVENUE, SUITE 1200 DALLAS, TEXAS 75202 – 2733

November 14, 2014

REPLY TO: 6EN-WR

James Martin 2896 Country Road Wynona, OK 74084

Re: Required Corrective Action Plan

Inventory No: OS5477 Well No.: 5-B

Location: SE/4, Sec. 33, T24N, R10E

Osage County, Oklahoma

Dear Mr. Martin:

Our March 4, 2013, approval of a plan for future use of the referenced injection well requires you to periodically monitor the static fluid level in the well. It also requires you to submit a corrective action plan if the static fluid level is less than 510 feet subsurface.

A July 15, 2014, inspection report indicates that the static fluid level in the referenced well is 500 feet below ground level. We have no record that you submitted the required corrective action plan. Therefore, you must submit a corrective action plan to this office within 15 days from the date of this letter. That plan may include: plugging the well, repairing it so that it has mechanical integrity, lowering the static fluid level to at least 510 feet subsurface, or any other action which will adequately protect drinking water sources.

The Safe Drinking Water Act requires the Environmental Protection Agency (EPA) to protect groundwater resources. Under the Act, the EPA can issue orders or administrative penalties for failure to protect USDWs. To prevent this type of enforcement action, please submit a corrective action plan, within 15 days, as requested.

Please contact Mr. David Aguinaga at 214-665-6439 if you have any questions.

Sincerely yours,

Paulette Johnsey Chief Water Resources Section



REGION 6 1445 ROSS AVENUE, SUITE 1200 DALLAS, TEXAS 75202 – 2733

November 14, 2014

REPLY TO: 6EN-WR

Mr. George Sheets T And L Oil Co. 12701 South O Street Tonkawa, OK 74653

Re: Required Corrective Action Plan

Inventory No: OS5537

Well No.: 2

Location: SE/4, Sec. 20, T25N, R03E

Osage County, Oklahoma

Dear Mr. Sheets:

On September 19, 2013, we approved a corrective action plan to prevent fluids from moving through the referenced well bore into underground sources of drinking water (USDWs) during its temporary abandonment period. That approval required you to convert the well to production use by October 31, 2013. A July 28, 2014, inspection report indicates that you have not completed required corrective actions and that the static fluid level in the referenced well is 150 feet below ground level.

Therefore, you must submit a corrective action plan to this office within 15 days from the date of this letter. That plan may include: plugging the well, repairing it so that it has mechanical integrity, lowering the static fluid level to at least 261 feet subsurface, or any other action which will adequately protect drinking water sources.

The Safe Drinking Water Act requires the Environmental Protection Agency (EPA) to protect groundwater resources. Under the Act, the EPA can issue orders or administrative penalties for failure to protect USDWs. To prevent this type of enforcement action, please submit a corrective action plan, within 15 days, as requested. Please contact Mr. David Aguinaga at 214-665-6439 if you have any questions.

Sincerely yours,

Paulette Johnsey Chief Water Resources Section



REGION 6 1445 ROSS AVENUE, SUITE 1200 DALLAS, TEXAS 75202 – 2733

November 11, 2014

REPLY TO: 6EN-WR

A.J Cooper Strike Axe Oil & Gas 11472 Okesa Road Bartlesville, OK 74003

Re: Plugging Requirement

Inventory No.: OS5707

Well No.: 2

Location: NW/4, Sec. 20, T 26N, R 11E

Osage County, Oklahoma

Dear Mr. Cooper:

A July 16, 2014, inspection report indicates that the referenced injection well is inactive. Osage Underground Injection Control regulations require inactive wells to be plugged within one year after injection ceases. We may extend the plugging deadline if you have an acceptable plan for future use of the well. Send us your plan for future use within 30 days from the date of this letter if you want an extended plugging deadline.

Please contact me at 214-665-6439 if you have any questions.

Sincerely yours,

David Aguinaga Environmental Scientist Water Resources Section



# REGION 6 1445 ROSS AVENUE, SUITE 1200 DALLAS, TEXAS 75202 – 2733

June 3, 2014

REPLY TO: 6EN-WR

Certified Mail # 7007 1490 0002 3413 8294 - Return Receipt Requested

Strike Axe Oil & Gas A.J. Cooper Rt 3 Box 5590 Bartlesville, OK 74003

Re: Termination of Authorization to Inject

Permit No.: 06S1261P5707

Well No.: 2

Location: NW/4, Sec. 20, T 26N, R 11E

Osage County, Oklahoma

Dear Mr. Cooper:

An April 23, 2014, inspection report indicates the referenced well failed a mechanical integrity test. Therefore, authorization to inject for this well is terminated. You must cease use of the well for underground injection of fluids and disconnect injection pipelines from the wellhead within five days from the date of this letter. You may resume use of the well for fluid injection after you successfully complete a mechanical integrity test and receive authorization to inject from this office.

Continued use of the well for fluid injection would violate the Safe Drinking Water Act and could result in further enforcement action. This enforcement may include administrative penalties.

Please contact Mr. David Aguinaga at 214-665-6439 if you have any questions.

Sincerely yours,

Jerry Saunders Associate Director Water Enforcement Branch

cc: BIA, Minerals Branch



REGION 6 1445 ROSS AVENUE, SUITE 1200 DALLAS, TEXAS 75202 – 2733

November 10, 2014

REPLY TO: 6EN-WR

Mr. Denny Hurst Petromerica Operating, LLC P.O. Box 988 Skiatook, OK 74070

Re: Violation of Injection Pressure Limit

Inventory No.: OS5759

Well No.: 2

Location: SE/4, Sec. 29, T 26N, R 11E

Osage County, Oklahoma

Dear Mr. Hurst:

A July 14, 2014, inspection report indicates that the injection pressure for the referenced injection well exceeded the limit of 425 psi.

The Safe Drinking Water Act authorizes the Environmental Protection Agency (EPA) to require injection wells to comply with the injection pressure limitation. Under the Act, the EPA can issue orders or administrative penalties for exceeding the authorized maximum injection pressure at the wellhead. To avoid this type of action, please take necessary action to limit pressure at the wellhead of the referenced well to 425 psi.

Please contact me at 214-665-6439 if you have any questions.

Sincerely yours,

David Aguinaga Environmental Scientist Water Resources Section

March 11, 2014

REPLY TO: 6EN-WR

Mr. John Campbell Belport Oil 1443 South Norfolk Avenue Tulsa, OK 74120

Re: Mechanical Integrity Test Failure

<u>Inventory No.</u> <u>Well No.</u> <u>Location-Osage County, Oklahoma</u> OS6022 MCCAIN 8-5A SW/4, Sec. 08, T 22N, R 8E

Dear Mr. Campbell:

On December 3, 2013, the referenced injection well failed a mechanical integrity test. It is, therefore, noncompliant with Osage Underground Injection Control program regulations which require injection wells authorized by rule to have mechanical integrity.

Within 15 days of the date of this letter, you must complete one of the following:

- 1. Demonstrate mechanical integrity of the well. Notify the Osage Nation Environmental and Natural Resources Department at 918-287-5333 at least five days before testing the well so they can witness the test.
- 2. Cease use of the well for fluid injection. You could resume use of the well for fluid injection after demonstrating that it has mechanical integrity.

The Safe Drinking Water Act authorizes the Environmental Protection Agency to require injection wells to have mechanical integrity. To avoid additional enforcement, please demonstrate mechanical integrity of the well or cease using it for fluid injection, within 15 days, as requested.

Please contact Mr. David Aguinaga at 214-665-6439 if you have any questions.

Sincerely yours,

Jerry Saunders Associate Director Water Enforcement Branch



REGION 6 1445 ROSS AVENUE, SUITE 1200 DALLAS, TEXAS 75202 – 2733

September 16, 2014

REPLY TO: 6EN-WR

Mr. Lanny Woods Jireh Resources, LLC 2526 East 71<sup>st</sup> Street, Suite A Tulsa, OK 74136

Re: Corrective Action Plan Approval

Inventory No.: OS6073 Well No.: 2-M

Location: SE/4 Sec. 15, T 26N, R 7E

Osage County, Oklahoma

Dear Mr. Woods:

A July 8, 2014, inspection report indicates the fluid level in the referenced well bore is 29 feet below the ground surface. By this letter we approve your September 3, 2014, corrective action plan. Your plan to squeeze cement and drill out the well should adequately protect underground sources of drinking water (USDWs) in the vicinity of the well, when completed. You must complete the proposed work within 30 days of receiving this letter.

Before beginning the work, obtain the necessary permits from the Bureau of Indian Affairs (BIA) Osage Agency. Contact the Osage Nation Environmental and Natural Resources Department (918-287-5333) at least five days before you test the well so they can witness the mechanical integrity test. After completing the work, submit an Osage Form No. 139 which shows completed work to the BIA and to this office.

Please contact Mr. David Aguinaga at 214-665-6439 if you have any questions.

Sincerely yours,

Paulette Johnsey Chief Water Resources Section



REGION 6 1445 ROSS AVENUE, SUITE 1200 DALLAS, TEXAS 75202 – 2733

November 18, 2014

REPLY TO: 6EN-WR

Certified Mail # 7007 1490 0002 3413 8430 - Return Receipt Requested

Ms. Jenny Buttram RDT Properties, Inc. 2431 East 61<sup>st</sup> St. Ste 850 Tulsa, OK 74136

Re: Termination of Authorization to Inject

Permit No.: 06S1262P6105

Well No.: B-11

Location: NE/4, Sec. 4, T 22N, R 12E

Osage County, Oklahoma

Dear Mr. Jones:

An August 26, 2014, inspection report indicates that the referenced well does not have mechanical integrity as required by Osage Underground Injection Control (UIC) regulations and the referenced permit. Therefore, authorization to inject for this well is terminated. You must cease use of the well for underground injection of fluids and disconnect injection pipelines from the wellhead within five days from the date of this letter. You may resume use of the well for fluid injection after you successfully complete a mechanical integrity test and receiving authorization to inject.

Continued use of the well for fluid injection would violate the Safe Drinking Water Act and could result in further enforcement action. This enforcement may include administrative penalties.

Please contact Mr. David Aguinaga at 214-665-6439 if you have any questions.

Sincerely yours,

Jerry Saunders Associate Director Water Enforcement Branch

cc: BIA, Minerals Branch



REGION 6 1445 ROSS AVENUE, SUITE 1200 DALLAS, TEXAS 75202 – 2733

November 18, 2014

REPLY TO: 6EN-WR

Certified Mail # 7007 1490 0002 3413 8447 - Return Receipt Requested

Ms. Sara Evans Red Fork Investments, Inc. 1437 S. Boulder, Suite 700 Tulsa, OK 74119

Re: Termination of Authorization to Inject

Permit No.: 06S1261P6128

Well No.: 1-28

Location: SW/4, Sec. 28, T 20N, R 12E

Osage County, Oklahoma

Dear Mr. Evans:

A file review indicates the referenced well does not have mechanical integrity. Therefore, authorization to inject for this well is terminated. You must cease use of the well for underground injection of fluids and disconnect injection pipelines from the wellhead within five days from the date of this letter. You may resume use of the well for fluid injection after you successfully complete a mechanical integrity test and receiving authorization to inject.

Continued use of the well for fluid injection would violate the Safe Drinking Water Act and could result in further enforcement action. This enforcement may include administrative penalties.

Please contact Mr. David Aguinaga at 214-665-6439 if you have any questions.

Sincerely yours,

Jerry Saunders Associate Director Water Enforcement Branch

cc: BIA, Minerals Branch

August 18, 2014

REPLY TO: 6EN-WR

Certified Mail # 7007 1490 0002 3413 8362- Return Receipt Requested

Mr. David Sell P.O. Box 182 Pawhuska, OK 74056

Re: Termination of Authorization to Inject

Permit No.: 06S1262P6149

Well No.: A-2

Location: SE/4, Sec. 06, T 27N, R 10E

Osage County, Oklahoma

Dear Mr. Sell:

An April 30, 2014, inspection report indicates the referenced injection well does not have mechanical integrity. Therefore, authorization to inject for this well is terminated. You must cease use of the well for underground injection of fluids and disconnect injection pipelines from the wellhead within five days from the date of this letter. You may resume use of the well for fluid injection after completing a mechanical integrity test and receiving authorization to inject.

Continued use of the well for fluid injection would violate the Safe Drinking Water Act and could result in further enforcement action. This enforcement may include administrative penalties.

Please contact Mr. David Aguinaga at 214-665-6439 if you have any questions.

Sincerely yours,

Jerry Saunders Associate Director Water Enforcement Branch

cc: BIA, Minerals Branch

November 24, 2014

REPLY TO: 6EN-WR

Certified Mail # 7007 1490 0002 3143 8461 - Return Receipt Requested

Mr. Ed Chesny Sullivan Osage, LLC 1437 S. Boulder Ave, Suite 1200 Tulsa, OK 74119

Re: Termination of Authorization to Inject

Permit No.: 06S1261P6170

Well No.: 15-32

Location: SE/4, Sec. 32, T 25N, R 061E

Osage County, Oklahoma

Dear Mr. Chesny:

A file review indicates the referenced injection well is overdue for a mechanical integrity test (MIT). Therefore, authorization to inject for this well is terminated. You must cease use of the well for underground injection of fluids and disconnect injection pipelines from the wellhead within five days from the date of this letter. You may resume use of the well for fluid injection after you successfully complete an MIT and receive authorization to inject.

Continued use of the well for fluid injection would violate the Safe Drinking Water Act and could result in further enforcement action. This enforcement may include administrative penalties.

Please contact Mr. David Aguinaga at 214-665-6439 if you have any questions.

Sincerely yours,

Jerry Saunders Associate Director Water Enforcement Branch

cc: BIA, Minerals Branch

November 18, 2014

REPLY TO: 6EN-WR

Certified Mail # - 7007 1490 0002 3413 8416 - Return Receipt Requested

Mr. Jim Heslet H&K Operating P.O. Box 3344 Bartlesville, TX 74006

Re: Termination of Authorization to Inject

Permit No.: 06S1261P6187

Well No.: 4A

Location: NE]/4, Sec. 7, T 27N, R 12E

Osage County, Oklahoma

Dear Mr. Heslet:

A July 7, 2014, inspection report shows the referenced well failed a mechanical integrity test (MIT). Therefore, authorization to inject for this well is terminated. You must cease use of the well for underground injection of fluids and disconnect injection pipelines from the wellhead within five days from the date of this letter. You may resume use of the well for fluid injection after you successfully complete an MIT and receive authorization to inject.

Continued use of the well for fluid injection would violate the Safe Drinking Water Act and could result in further enforcement action. This enforcement may include administrative penalties.

Please contact Mr. David Aguinaga at 214-665-6439 if you have any questions.

Sincerely yours,

Jerry Saunders Associate Director Water Enforcement Branch

cc: BIA. Minerals Branch



REGION 6 1445 ROSS AVENUE, SUITE 1200 DALLAS, TEXAS 75202 – 2733

August 6, 2014

REPLY TO: 6EN-WR

Mr. J. Scott DuCharme Performance Energy Resources, LLC PO Box 628 Barnsdall, OK 74002

Re: Failure to Comply with Permit Condition

Permit No.: 06S1261P6234

Well No.: 4A

Location: SW/4, Sec. 14, T 27N, R 11E

Osage County, Oklahoma

Dear Mr. DuCharme:

Condition I.B.5 of the referenced permit requires you annually obtain a static fluid level on the referenced well after a 24 hour shut-in period. Osage Underground Injection Control regulations and the referenced permit require you to continuously comply with all permit conditions. Therefore, you must submit record of the static fluid level to complete the 2014 Annual Report. If you did not obtain a fluid level during the 2014 operating period, you may shut-in the well to do so. Send your static fluid level to this office with 30 days.

The Safe Drinking Water Act authorizes the Environmental Protection Agency (EPA) to issue permits and require compliance with permit conditions. Under the Act, the EPA can issue orders or administrative penalties for failure to comply with permit conditions. To avoid this type of enforcement action, please take actions necessary to comply with all permit conditions.

Please contact me at 214-665-6439 if you have any questions.

Sincerely yours,

David Aguinaga Environmental Engineer Water Resources Section

cc: Osage Nation Environmental and Natural Resources Department BIA, Minerals Branch

6EN-WR:daguinaga:8.6.14:ENFCODE:M6 R:\DA\UIC\2014\6234\_20

August 20, 2014

REPLY TO: 6EN-WR

Certified Mail # 7007 1490 0002 3413 8287- Return Receipt Requested

Mr. Wayne Porter Nadel and Gussmann, LLC 15 E. 5<sup>th</sup> St., Suite 3200 Tulsa, OK 74103

Re: Termination of Authorization to Inject

Permit No.: 06S1261P6378

Well No.: 2A-16

Location: NW/4, Sec. 16, T 27N, R 07E

Osage County, Oklahoma

Dear Mr. Porter:

A June 25, 2014, inspection report indicates the referenced injection well has lost mechanical integrity. Therefore, authorization to inject for this well is terminated. You must cease use of the well for underground injection of fluids and disconnect injection pipelines from the wellhead within five days from the date of this letter. You may resume use of the well for fluid injection after demonstrating the well has mechanical integrity and receiving an EPA Region 6, written authorization to inject.

Continued use of the well for fluid injection would violate the Safe Drinking Water Act and could result in further enforcement action. This enforcement may include administrative penalties.

Please contact Mr. David Aguinaga at 214-665-6439 if you have any questions.

Sincerely yours,

Jerry Saunders Associate Director Water Enforcement Branch

cc: BIA. Minerals Branch

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## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6 1445 ROSS AVENUE, SUITE 1200 DALLAS, TEXAS 75202 – 2733

NOV 2 5 2014

REPLY TO: 6EN-WR

Mr. Charlie Paulson B.O.G. Osage, L.L.C. P.O. Box 13178 Oklahoma City, OK 73114

Re:

Mechanical Integrity Test Failures

Inventory No. Well No.

Location-Osage County, Oklahoma

OS1364

1

NE/4, Sec. 32, T 22N, R 10E

OS1377

W-6

SW/4, Sec. 32, T 22N, R 10E

Dear Mr. Paulson:

On August 22, 2014, the referenced injection wells failed a mechanical integrity tests. They are, therefore, noncompliant with Osage Underground Injection Control program regulations which require injection wells authorized by rule to have mechanical integrity.

Within 15 days of the date of this letter, you must complete one of the following:

- 1. Demonstrate mechanical integrity of the wells. Notify the Osage Nation Environmental and Natural Resources Department at 918-287-5333 at least five days before testing the well so they can witness the test.
- 2. Cease use of the wells for fluid injection. You could resume use of the wells for fluid injection after demonstrating they have mechanical integrity.

The Safe Drinking Water Act authorizes the Environmental Protection Agency to require injection wells to have mechanical integrity. To avoid additional enforcement, please demonstrate mechanical integrity of the well or cease using it for fluid injection, within 15 days, as requested. Please contact Mr. David Aguinaga at 214-665-6439 if you have any questions.

Sincerely yours,

Associate Director

Water Enforcement Branch

cc:

BIA, Minerals Branch

October 10, 2014

REPLY TO: 6EN-WR

Ms. Nancy Hunziker EOR-Regulatory Chaparral Energy, LLC 701 Cedar Lake Boulevard Oklahoma City, OK 73114

Re: Overdue Mechanical Integrity Test and Test Failures

Inventory No.	Well No.	Location-Osage County, Oklahoma	<u>Status</u>
OS0359	44W28	NE/4, Sec. 19, T 27N, R 6E	MIT Fail 8/13/14
OS0533	87-W3	SE/4, Sec. 31, T 27N, R 6E	MIT Fail 9/30/14
OS0568	95-W3	NE/4, Sec. 06, T 26N, R 6E	MIT Fail 9/3/14
OS0569	95-W4	NE/4, Sec. 06, T 26N, R 6E	MIT Fail 9/3/14
OS3994	M-W14	NE/4, Sec. 10, T 25N, R 6E	MIT Fail 7/1/13
OS4671	W-4	NW/4, Sec. 4, T 23N, R 7E	MIT Fail 6/19/14
OS4778	13	SW/4, Sec. 32, T 28N, R 8E	Overdue 7/14/14

## Dear Ms. Hunziker:

The referenced injection wells failed mechanical integrity tests or are overdue for testing. They are, therefore, noncompliant with Osage Underground Injection Control program regulations which require injection wells authorized by rule to have mechanical integrity.

Within 15 days of the date of this letter, you must complete one of the following:

- 1. Demonstrate mechanical integrity of the wells. Notify the Osage Nation Environmental and Natural Resources Department at 918-287-5333 at least five days before testing the well so they can witness the test.
- 2. Cease use of the wells for fluid injection. You could resume use of the wells for fluid injection after demonstrating that they have mechanical integrity.

The Safe Drinking Water Act authorizes the Environmental Protection Agency to require injection wells to have mechanical integrity. To avoid additional enforcement, please demonstrate mechanical integrity of the wells or cease using them for fluid injection, within 15 days, as requested.

Please contact Mr. David Aguinaga at 214-665-6439 if you have any questions.

Sincerely yours,

Jerry Saunders Associate Director Water Enforcement Branch

cc: BIA, Minerals Branch Osage Nation Environmental and Natural Resources Department

## NAGEN OF PROTECTION

## UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

## REGION 6 1445 ROSS AVENUE, SUITE 1200 DALLAS, TEXAS 75202 – 2733

OCT 3 1 2014

REPLY TO: 6EN-WR

Certified Mail 7007 1490 0002 3413 8393 - Return Receipt Requested

Ms. Nancy Hunziker EOR-Regulatory Chaparral Energy, LLC 701 Cedar Lake Boulevard Oklahoma City, OK 73114

Re: Termination of Authorization to Inject

Well ID:	Well No.	Location: Osage County, Oklahoma
OS6273.005	23-W41	NW/4, Sec. 14, T 27N, R 5E
OS6273.004	23-W28	NW/4, Sec. 14, T 27N, R 5E
OS6273.009	24-W41	NW/4, Sec. 14, T 27N, R 5E
OS6273.002	23-W23	NW/4, Sec. 14, T 27N, R 5E
OS6273.006	24-W41	NE/4, Sec. 14, T 27N, R 5E
OS6273.019	31-W42	SW/4, Sec. 14, T 27N, R 5E
OS6273.039	32-W25	NW/4, Sec. 14, T 27N, R 5E

Dear Ms. Hunziker:

Field reports indicate that two plugged and abandoned wells within the Area of Review (AOR) of the referenced injection wells have become compromised due to the high pressure in the North Burbank Unit Permit area. Therefore, authorization for the wells to inject is terminated. You must cease use of the wells for underground injection and disconnect injection pipelines from the wellheads within five days from the date of this letter. You may resume use of the wells for fluid injection after you complete proper plugging of compromised wells within the AOR.

Continued use of the wells for fluid injection would violate the Safe Drinking Water Act and could result in further enforcement action. This enforcement may include administrative penalties. Please contact Mr. David Aguinaga at 214-665-6439 if you have any questions.

Sincerely yours,

John Blevinse

Compliance Assurance and

Enforcement Division

cc: BIA, Minerals Branch

April 18, 2014

REPLY TO: 6EN-WR

Certified Mail # - 7007 1490 0002 3413 8270 Return Receipt Requested

Mr. Erwin Pinot Chaparral Energy, LLC 701 Cedar Lake Boulevard Oklahoma City, OK 73114

Re: Termination of Authorization to Inject and Requirement to cease injection

EPA ID	Well No.	Location: Osage County, Oklahoma
OS0274	NBU 25W-28	NW/4, Sec. 13, T 27N, R 5E
OS3289	NBU 41W-28	NW/4, Sec. 13, T 27N, R 5E
OS6274	SBU 5W-5	NW/4, Sec. 2, T 25N, R 6E

Dear Mr. Pinot:

The referenced injection wells failed mechanical integrity tests therefore authorization to inject for these wells is terminated. You must cease use of the wells for underground injection of fluids and disconnect injection pipelines from the wellhead within five days from the date of this letter. You may resume use of the wells for fluid injection after you demonstrate mechanical integrity and receive authorization to inject from this office.

Continued use of the wells for fluid injection would violate the Safe Drinking Water Act and could result in further enforcement action. This enforcement may include administrative penalties.

Please contact Mr. David Aguinaga at 214-665-6439 if you have any questions.

Sincerely yours,

Jerry Saunders Associate Director Water Enforcement Branch

cc: BIA. Minerals Branch

October 10, 2014

REPLY TO: 6EN-WR

Ms. Nancy Hunziker EOR-Regulatory Chaparral Energy, LLC 701 Cedar Lake Boulevard Oklahoma City, OK 73114

Re: Violation of Injection Pressure Limit

Inventory No.	Well No.	Location: Osage County, Oklahoma
OS6273006	NBU 24-W21	NE/4, Sec. 14, T 27N, R 5E
OS6273016	NBU 16-W24	SE/4, Sec. 11, T 27N, R 5E
OS6273050	NBU 11-W21	NW/4, Sec. 12, T 27N, R 5E

Dear Ms. Hunziker:

Inspection reports indicate that the injection pressure for the referenced injection wells exceeded the operating pressure limits.

The Safe Drinking Water Act authorizes the Environmental Protection Agency (EPA) to require injection wells to comply with the injection pressure limitation. Under the Act, the EPA can issue orders or administrative penalties for exceeding the authorized maximum injection pressure at the wellhead. To avoid this type of action, please take necessary action to limit pressure at the wellhead of the referenced wells to 850psi.

Please contact me at 214-665-6439 if you have any questions.

Sincerely yours,

David Aguinaga Environmental Scientist Water Resources Section

cc: Osage Nation Environmental and Natural Resources Department BIA, Minerals Branch



REGION 6 1445 ROSS AVENUE, SUITE 1200 DALLAS, TEXAS 75202 – 2733

July 2, 2014

REPLY TO: 6EN-WR

Ms. Melanie Crawford Linn Operating, Inc. 14000 Quail Springs Pkwy, Ste 5000 Oklahoma City, OK 73134

Re: Mechanical Integrity Test Failure

Inventory No.	Well No.	Location-Osage County, Oklahoma
OS2956	G2	SW/4, Sec. 4, T 24N, R 07E
OS3004	MB-A-12	SW/4, Sec. 23, T 26N, R 06E
OS3046	WILFR14	NE/4, Sec. 3, T 26N, R 06E

Dear Ms. Crawford:

Inspection reports indicate the referenced injection wells failed mechanical integrity tests. They are, therefore, noncompliant with Osage Underground Injection Control program regulations which require injection wells authorized by rule to have mechanical integrity.

Within 15 days of the date of this letter, you must complete one of the following:

- 1. Demonstrate mechanical integrity of the wells. Notify the Osage Nation Environmental and Natural Resources Department at 918-287-5333 at least five days before testing the wells so they can witness the tests.
- 2. Cease use of the wells for fluid injection. You could resume use of the wells for fluid injection after demonstrating that they have mechanical integrity.

The Safe Drinking Water Act authorizes the Environmental Protection Agency to require injection wells to have mechanical integrity. To avoid additional enforcement, please demonstrate mechanical integrity of the wells or cease using it for fluid injection, within 15 days, as requested.

Please contact Mr. David Aguinaga at 214-665-6439 if you have any questions.

Sincerely yours, Jerry Saunders Associate Director Water Enforcement Branch

cc: BIA, Minerals Branch

October 20, 2014

REPLY TO: 6EN-WR

Ms. Melanie Crawford Regulatory Specialist II Linn Operating, Inc. 14000 quail Springs Parkway, Suite 5000 Oklahoma City, OK 73134

Re: Overdue Mechanical Integrity Test and Test Failures

Inventory No.	Well No.	Location-Osage County, Oklahoma	<u>Status</u>
OS1001	191	SW/4, Sec. 9, T 23N, R 08E	Overdue 12/1/13
OS2872	NRU 17-1W	NE/4, Sec. 21, T 24N, R 07E	Overdue 2/11/14
OS2999	MGBUU G-14	SE/4, Sec. 27, T 26N, R 06E	MIT Fail 8/13/14
OS3002	MBU A-6	SW/4, Sec. 23, T 26N, R 06E	MIT Fail 8/21/14
OS3041	DENOYA 12	NW/4, Sec. 11, T 26N, R 06E	MIT Fail 8/27/14

Dear Ms. Crawford

The referenced injection wells are overdue or have failed mechanical integrity tests. They are, therefore, noncompliant with Osage Underground Injection Control program regulations which require injection wells authorized by rule to have mechanical integrity.

Within 15 days of the date of this letter, you must complete one of the following:

- 1. Demonstrate mechanical integrity of the wells. Notify the Osage Nation Environmental and Natural Resources Department at 918-287-5333 at least five days before testing the well so they can witness the test.
- 2. Cease use of the wells for fluid injection. You could resume use of the wells for fluid injection after demonstrating that it has mechanical integrity.

The Safe Drinking Water Act authorizes the Environmental Protection Agency to require injection wells to have mechanical integrity. To avoid additional enforcement, please demonstrate mechanical integrity of the well or cease using it for fluid injection, within 15 days, as requested.

Please contact Mr. David Aguinaga at 214-665-6439 if you have any questions.

Sincerely yours,

Jerry Saunders Associate Director Water Enforcement Branch

cc: BIA, Minerals Branch

May 19, 2014

REPLY TO: 6EN-WR

Mr. Mark McCain McCain Resources 1613 West 6<sup>th</sup> Street Bartlesville, OK 74003

Re: Mechanical Integrity Test Failure – Termination of Authorization to Inject

Inventory No.	Well No.	Location-Osage County, Oklahoma
OS1845	2	NE/4, Sec. 9, T 26N, R 10E
OS3285	2	SE/4, Sec. 25, T 27N, R 11E

Dear Mr. McCain:

The referenced injection wells failed a mechanical integrity test. Therefore, authorization to inject for these wells is terminated. You must cease use of the wells for underground injection of fluids and disconnect injection pipelines from the wellhead within five days from the date of this letter.

Continued use of the well for fluid injection would violate the Safe Drinking Water Act and could result in further enforcement action. This enforcement may include administrative penalties.

Please contact Mr. David Aguinaga at 214-665-6439 if you have any questions.

Sincerely yours,

Jerry Saunders Associate Director Water Enforcement Branch

cc: BIA, Minerals Branch



REGION 6 1445 ROSS AVENUE, SUITE 1200 DALLAS, TEXAS 75202 – 2733

November 18, 2014

REPLY TO: 6EN-WR

Mr. Jim H Heslet P.O. Box 3344 Bartlesville, OK 74006

Re: Mechanical Integrity Test Failure

Inventory No. Well No. Location-Osage County, Oklahoma OS4748 4 NW/4, Sec. 4, T 27N, R 12E

Dear Mr. Heslet:

On August 20, 2014, the referenced injection well failed a mechanical integrity test. It is, therefore, noncompliant with Osage Underground Injection Control program regulations which require injection wells authorized by rule to have mechanical integrity.

Within 15 days of the date of this letter, you must complete one of the following:

- 1. Demonstrate mechanical integrity of the well. Notify the Osage Nation Environmental and Natural Resources Department at 918-287-5333 at least five days before testing the well so they can witness the test.
- 2. Cease use of the well for fluid injection. You could resume use of the well for fluid injection after demonstrating that it has mechanical integrity.

The Safe Drinking Water Act authorizes the Environmental Protection Agency to require injection wells to have mechanical integrity. To avoid additional enforcement, please demonstrate mechanical integrity of the well or cease using it for fluid injection, within 15 days, as requested.

Please contact Mr. David Aguinaga at 214-665-6439 if you have any questions.

Sincerely yours,

Jerry Saunders Associate Director Water Enforcement Branch

cc: BIA. Minerals Branch



REGION 6 1445 ROSS AVENUE, SUITE 1200 DALLAS, TEXAS 75202 – 2733

July 21, 2014

REPLY TO: 6EN-WR

Mr. Andy Smith Smith Petroleum, LLC P. O. Box 134 Barnsdall, OK 74002

Re: Failure to Complete Corrective Action / Overdue Plugging of Injection Well

Inventory No.: Well No.: Location: Osage County, Oklahoma

OS3706 1W SW/4, Sec. 19, T25N, R11E OS4916 64 SW/4, Sec. 20, T25N, R11E

Dear Mr. Smith:

A June 3, 2014, letter required you complete a corrective action for well OS3706 to prevent fluids from moving through the referenced well bore into underground sources of drinking water (USDWs). An April 29, 2014, inspection report indicates the static fluid level in the well is 311 feet below the ground surface. This is above the zone of USDWs in the vicinity of the well. To this date we have not received a corrective action plan.

Your February 12, 2013, letter notified us that you intend to plug well OS4916. To date we have no record that you plugged the well as required. Therefore, you must do one of the following within 30 days from the date of this letter:

- 1. If you have plugged the well, send us an Osage Form No. 139 which shows how the well was plugged.
- 2. If you have not plugged the well, plug it according Osage Underground Injection Control regulations. At least five days before beginning plugging operations, submit a plugging plan to the Osage Nation Department of Environmental and Natural Resources, PO Box 1495, Pawhuska, OK 74056.
- 3. Send us your plan for future use.

The Safe Drinking Water Act authorizes the Environmental Protection Agency (EPA) to protect USDWs from contamination and require plugging of inactive injection wells. Under the Act, the EPA can issue orders or administrative penalties for failure to complete corrective action and plugging as required.

To avoid this type of enforcement action, please submit your corrective action plan for well OS3706 and documentation that well OS4916 has been plugged or submit a plan for its future use, within 30 days, as requested.

Please contact Mr. David Aguinaga at 214-665-6439 if you have any questions.

Sincerely yours

Paulette Johnsey Chief Water Resources Section

cc: BIA, Minerals Branch
Osage Nation Environmental and Natural Resources Department